

October 20, 1999

FDA/Dockets Management Branch
5630 Fishers Lane, Room 1061
Rockville, MD 20852
re: Docket No. 97N-0074

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Dear FDA:

I'm writing to urge the FDA to take serious action to ensure the safety of eggs. Tainted eggs pose a serious health risk to consumers, and the FDA should focus its attention on factory farms where filth and poor animal husbandry practices increase the threat.

This past July, the President created a task force to develop by November 1st a plan to decrease the infection of shell eggs by the bacterium *salmonella*. The Centers for Disease Control first identified eggs as a carrier for this bacterium in 1988. Since then, thousands of people who've eaten tainted eggs have been sickened, putting great stress on an already overburdened health care system. For the very young, very old, and immune deficient, *salmonella* infection can mean severe illness and even death.

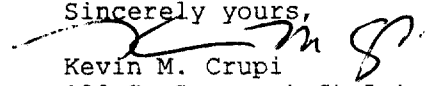
Unfortunately, the FDA--the federal party responsible for consumer safety--has done almost nothing to protect the public from *salmonella* infection in eggs, presumably to avoid offending wealthy agribusiness. According to a General Accounting Office report on this problem and other farm monitoring groups, the FDA should focus its resources where eggs are produced--on the farm.

Unfortunately, the majority of egg-laying hens are no longer raised in idyllic settings like Old McDonald's Farm but instead on brutal factory farms where thousands of birds are confined in small, filthy cages. The combination of this confinement in unhealthy conditions and other poor husbandry practices--such as forced molting where factory farmers starve and deny water to the birds for inhumanely long periods to change the hens' natural cycle and increase egg production--stresses the birds' immune system and leaves them more prone to *salmonella* and other bacterial infection. The factory farmers' routine use of antibiotics to control disease in their animals has resulted in the development of dangerous antibiotic-resistant strains of bacteria, which threaten our population with diseases that will be untreatable.

The good news is that hens raised in less intensive husbandry systems are less susceptible to *salmonella* and other diseases. The group Food Animal Concerns Trust (FACT) established a farming model called Nest Eggs, where free-range hens receive more than five times the space of caged birds and are free to enjoy a more natural, healthy environment. Between 1993 and 1998, FACT reports the number of Nest Eggs flocks infected with *salmonella* fell from 25 percent to 6 percent.

Please take quick action to ensure the safety of eggs and put consumer protection above the special interest needs of rich agribusiness. The FDA should: 1) require all egg farms to conduct environmental tests for *salmonella* during the life of the flock; 2) divert eggs from *salmonella* positive flocks from the market; 3) test feed for *salmonella* infection; 4) ban the cruel practice of forced molting; and 5) stop the use of cages for egg-laying hens. Thank you.

Sincerely yours,


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